OATS
Older Adults Technology Services

1713 Eighth Avenue, #8
Brooklyn, New York 11215
718.360.1707
www.oatsny.org

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: In re the Matter of a National Broadband Plan for Our Future, NBP Public Notice #16, GN Docket No. 09-51

Dear Ms. Dortch:

Older Adults Technology Services (OATS) respectfully submits these responses to the queries outlined in NBP Public Notice #16, which was issued as part of the above-referenced FCC docket.

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I. Introduction

OATS commends the FCC for focusing on the critically important issue of broadband adoption. The Public Notice on this topic signals a commitment to developing a robust set of adoption policies for inclusion in the Commission's forthcoming national broadband plan. OATS continues to urge the FCC to focus on broadband adoption first and foremost.[1] In particular, the Commission should develop mechanisms to spur broadband adoption among under-adopting segments of the population like older adults, people with disabilities, low-income residents, and African Americans. At a time when broadband is widely available, digital equity requires a concerted and coordinated effort by all stakeholders – policymakers, regulators, innovators, and educators – to close this gap and maximize the adoption rate.

In this spirit, OATS offers the following responses to the Commission's queries regarding broadband adoption. Part II of this filing provides an overview of the OATS model. Part III offers key insights and observations flowing from OATS's experiences in providing computer and broadband training to older adults over the last five years.

[1] OATS made this argument in previously filed comments in this docket. *See* Reply Comments of Older Adults Technology Services, In the Matter of a National Broadband Plan for Our Future, GN Docket No, 09-51 (July 21, 2009) (urging the FCC to "focus first and foremost on incorporating a robust set of broadband adoption mechanisms – including education and awareness campaigns, and support for training programs and initiatives that build community between seniors online – into its national broadband plan," *ibid*. at p. 2).

II. Overview of OATS & the OATS Model

Since 2004, Older Adults Technology Services (OATS) has worked to develop an effective and sustainable strategy for engaging, training, and supporting an under-adopting segment of the population—senior citizens—in utilizing broadband technology to improve their lives. The New York City-based organization has developed the largest and most successful municipal technology program in the country to help older adults access technology, providing intensive training to over 5,000 individuals, developing partnership with 50 local partners, and raising over two million dollars in public, private and philanthropic support.

The OATS program is a national model that has garnered extensive attention from policymakers, nonprofit leaders, and the media. In addition to extensive press coverage in *The New York Times, New York Daily News, NBC Channel 4 News, NY1 News,* and other news outlets, OATS was recently featured in *The Impact of Broadband on Senior Citizens*, published by the Advanced Communications Law and Policy Institute at New York Law School (and commissioned by the U.S. Chamber of Commerce); is the subject of a case study in *Generation Blend: Managing Across the Digital Age Gap*, by Rob Salkowitz (part of the Microsoft Executive Leaders Series); and is currently the site of a major social impact study funded by the Fan Fox and Leslie R. Samuels Foundation.

The organization serves primarily low-income older individuals from diverse backgrounds:

- Over 36 percent of participants report earning below $13,200 per year.
- 48 percent report a significant physical disability.
- 48 percent live alone
- 31percent are white.
- The average age is 72.

The organization's 50 partner sites are located in all five boroughs of New York City, with particular concentrations in the South Bronx, Upper Manhattan, and Central Brooklyn.

Seniors remain one of the country's most under-adopting populations when it comes to broadband. Recent data indicates that just 42 percent of seniors are online, while only 35 percent of senior households have adopted broadband at home. A study of New York City public housing families found that *only five percent of senior-headed households have broadband at home*—a rate twelve times lower than younger families.

OATS is a results-driven organization with a strong commitment to high quality services. Preliminary findings from the Samuels-funded study indicate strong positive impacts from OATS programs:[2]

[2] The study is being conducted by a very well respected New York-based research and policy organization. All results are based on two rounds of interviews with 75 OATS participants (15 at home), all of whom had computers and broadband access at home. The study will be released in early 2010.

- 99 percent of study participants reported their ability to use a computer increased as a result of taking the OATS course (significantly - 70 percent; somewhat - 30 percent)
- Daily computer use by participants increased from 39 percent to 73 percent.
- Email communication with friends and family rose from 31 percent to 88 percent.
- Use of the internet for health research increased from 72 percent to 89 percent.
- Participants reporting positive feelings using technology rose from 49 to 80 percent.

Final data are still being collected as the independent researchers conduct post-training interviews with participants three months after the completion of OATS courses, but initial feedback from participants is consistent with the lessons from OATS internal surveys: Older adults who participate in OATS classes in community technology labs or at home experience increased use of broadband and technology, enhanced connection to friends and family, better access to health care information and services, and more confidence using technology to support their continued independence and quality of life.

In general, OATS's hands-on training provides older adults with a clear value proposition for adopting and actively using a broadband connection. In many cases, exposure to the many benefits that broadband enables convinced otherwise reluctant seniors to purchase a home computer and to subscribe to broadband on a monthly basis. Even though many of OATS's students live on fixed incomes, a significant number find broadband affordable once they are exposed to its practical benefits and capable of effectively using their connection to enable these gains.[3]

III. Key Insights & Observations

In five years of developing and delivering training and other support services to seniors across New York City, OATS has learned some critical lessons about the requirements for successful programs to facilitate broadband and technology utilization by older adults. These relate to the challenges faced by nonprofit organizations in creating effective program models, establishing working partnerships with community based providers, developing sustainable approaches to funding and administration, and achieving lasting outcomes for customers. As the FCC explores a range of policies and approaches in preparation of its national broadband plan, OATS would like to share some of this essential learning.

A. Effective Program Design

[3] The price/affordability distinction is critical when analyzing the broadband adoption dynamics for older adults. As discussed in more detail below, many seniors initially perceive broadband to be unaffordable at almost any price point because they do not see the value in using a broadband connection. However, after being offered a clear value proposition by OATS trainers, many students quickly overcome their initial skepticism of broadband and eventually come to view it as an invaluable tool. As a result, many older adults begin to view broadband as affordable at a wider array of price points.

When OATS first began working with technology and older adults in 2004, there were no established models for training and program design that had achieved lasting success in New York City. A survey of sites with computer labs indicated that many senior centers, affordable housing developments, and recreation centers housed computer labs, but virtually none had been able to sustain high quality training for older adults over time. Moreover, there were no established sources of funding to support programs operating at the intersection of policies on aging and technology.

The lack of existing models created special challenges, but afforded OATS the luxury of guiding program development from a relatively open strategic point of view. The simple operating principle emerged from answering the question, "*What do older adults need in order to become engaged in learning technology, develop the necessary skills, and continue to utilize technology to improve their lives?"*

OATS innovated several strategic solutions to help answer this question in an actionable way:

- Professionalize training and services. Previous, unsuccessful, efforts had utilized volunteer or low-wage trainers to administer programs in an episodic fashion with little oversight or professional development. OATS recruited staff and consultants with deep experience in social work, adult education, technology services, and social activism. Full-time salaries, higher wage rates, competitive benefits, positive work environments, and regular professional development led to high rates of staff retention. The results have been very promising; most OATS trainers have taught over 500 sessions of community-based training to older adults.
- Maximize relevance. OATS redesigned curricula to focus on the immediate needs of older learners. Basic classes increased focus on input devices such as the mouse and keyboard for new learners, while integrating content on health research, connection to family, and other topics of critical relevance to older individuals. Classes meet twice a week to improve retention, but last only 75 minutes to reduce fatigue. Courses last for ten weeks, and seniors are not charged for participation.
- Go mobile. OATS does not operate a community technology center of its own. Instead, it has chosen to work through an extensive network of partnerships and to train in labs donated by community-based nonprofits as well as in the homes of older adults with mobility impairment. This approach has led to a high degree of flexibility and adaptability in program delivery as OATS has become very adept at scheduling courses in collaboration with a wide range of partners, and deploying staff to sites where they can most effectuate change.
- Focus beyond the technology. If the purpose of OATS programs were simply to teach a senior how to use email and the internet, our program would not generate nearly the enthusiasm from staff, customers, and other stakeholders that it currently enjoys. A critical component of its success has been a continual focus on the social impacts of the work—improved social connection, better health, additional capacity for seniors to live independently, enhanced community for older adults, increased access to essential services, and a general feeling of increased relevance. These are the issues that animate OATS personnel and which are at the core of our motivation to succeed over time.

Another critical component of OATS's approach to spurring broadband adoption among older adults is the identification of the many barriers that impede more robust utilization of this technology. The notion of "barriers to broadband adoption" has been discussed at length in a variety of contexts, and the general conclusion among stakeholders appears to be that most under-adopting user groups face a unique set of impediments to broadband adoption. Older adults certainly face a multiplicity of barriers to broadband adoption. These include: low computer ownership rates (which OATS addresses via partnerships with computer refurbishers; see below); affordability of broadband to seniors living on fixed incomes (see below); concerns regarding internet safety (which OATS addresses in its courses); and a general skepticism regarding the true value of using broadband (see above). OATS has designed its courses with these and other more parochial barriers in mind (e.g., bringing the training courses to neighborhood community centers).

The sum of these components is the simple recognition that OATS does what it takes to engage, train, and support older adults successfully. OATS starts with a clear focus on our clients and their needs, and designs a program specific to this population. Programs serving different populations such as people with disabilities, immigrants, etc., will presumably look quite different, but the overriding logic of matching program design to the particular needs of the group—content, geography, learning style, utilization objectives—should prevail across sectors and locales.

B. Projecting Demand

Mario Tapia, who is executive director of the Latino Gerentological Center, a nonprofit that serves the Hispanic elderly in New York City, hosts a 6:30am show on the local Spanish-language Univision channel. In May of 2008, Mario did a five-minute spot about the OATS program and provided his audience with the telephone numbers for the enrollment hotline and main office. By 9:00am, both phone lines were flooded with calls, rendering them unusable, and the office phone rang constantly for several days with Spanish-speaking seniors asking where they could take classes. OATS had to hire temporary consultants to handle all the calls and attempt to schedule as many callers as possible for classes, but several hundred callers were unable to be scheduled due to resource limitations.

This episode is illustrative of the latent demand that exists for quality technology training and support for older individuals, and explains why OATS typically does not advertise its classes outside of the centers where it provides its programs. The vast majority of class sessions are filled (to a maximum of 12 participants per session) through word-of-mouth at the local sites. OATS has learned that, when programs are sustained at a high quality over time, are delivered with professional staff, are offered in partnership with community-based organizations, and are free of charge to the seniors (as are many services provided to this population), there is strong and consistent interest in taking classes.

It is difficult to estimate exactly how many senior citizens would eventually take technology classes if sufficient resources were to be dedicated to potentially serve everyone interested. In

New York City, OATS makes the following assumptions about the potential demand for services:

- There are nearly 1.3 million New York City residents over the age of 60. Approximately 58 percent of them are not online, while only seven percent of younger Americans are not online, which suggests that as many as 50 percent of older New Yorkers (more than 500,000 people) might still begin using broadband at home or in community settings, given the appropriate outreach, engagement, training, and support.
- There are at least 100 community centers in New York City alone where OATS could teach classes to older adults, resources permitting. Past experience suggests that OATS can provide multi-week classes to an average of 60 older adults per site each year, which translates into at least 6,000 participants in intensive training per year.
- Adding outreach seminars (such as the "Wired Senior" presentation or "Touch Tank" events; see below) allows us to reach another 10,000 older adults with one-day programs, while at-home services such as the OATS health training initiative can certainly reach many thousands more.
- By providing subsidized or free hardware and internet access to poor seniors (especially those with mobility impairment—approximately 50,000 individuals in New York City alone) OATS vastly increases the pool of available participants, especially if it is focused on broadband adoption at home.

As a general estimate of the impact of a well-funded OATS program in New York City, OATS estimates that the organization can train approximately 10,000 people per year through lab-based classes, seminars, at-home programs, and intergenerational initiatives, which would translate into reaching approximately 10 percent of the entire population of older adults over a ten-year period. It is not unreasonable to estimate that a sustained initiative might increase broadband utilization among seniors by ten percent or more over time.

In light of such high levels of latent demand, policies focused specifically on broadband adoption are needed to provide service providers like OATS with guidance regarding the priorities of government at the local, state, and national levels. Aligning the priorities of government with those of service providers will ensure a more comprehensive and effective approach to spurring utilization of broadband.

C. Creating Sustainable Institutions

Possibly the most significant ingredient in the success of the New York City model is the development of a dedicated organization to champion this mission over an extended period of time. Virtually all other cities and states append technology training and programs to existing multi-purpose initiatives, which too often translates into technology training and adoption programs getting lost in the shuffle of competing priorities and resource decisions. By launching an independent organization whose sole mission is to engage, train, and support older adults in using technology to improve their quality of life and increase their social and civic engagement, OATS created a lasting hub around which quality services could be developed, and which could attract and deploy resources in a strategic manner.

An organization with a sizable geographic focus has the ability to assemble resources from a range of sectors and develop partnerships with community-based groups that have both the interest and capacity to implement programs effectively. Despite operating in a period of significant fiscal uncertainty and cutbacks, OATS has been able to increase its operating budget and scope of operations every year since 2004, and has increased its pool of partner sites to include senior centers, hospitals, housing developments, nursing homes, recreation centers, and public schools.

A number of academic studies in public policy have coalesced into a sub-field called "New Institutionalism" that emphasizes the role of institutions and their make-up in determining the direction and success of efforts at policy change.[4] Important themes include organizational capacity, institutional history and values, leadership, and the character of relationships with outside stakeholders. The OATS experience provides a classic case study relevant to these themes, as the organization's very existence and structural relationships to its environment were keys to the advances achieved in its programming.

D. Focus on Results, Not Preconceptions

Throughout its development, OATS has faced the problem of resources that were unavailable for our programs because they were too tightly restricted to fit its program model. Many of these resources appear to have been originally intended to support outcomes such as those pursued by OATS—social engagement, better health, more independence—but applications for the programs were restricted in various ways that obviated support for the model.[5]

Public sector resources are often keyed to nutrition programs that are outside the scope of the OATS mission, or are narrowly defined to focus on hardware and technology infrastructure, making organizations that provide training or technology services ineligible for funding. Philanthropic resources are sometimes limited to programs that actually operate community technology labs (as opposed to providing training through partnerships, as OATS does), or require that supported organizations use proprietary software created by the funding entity (which are often inappropriate for use in the OATS partner sites).

The OATS program model has been successful largely due to its flexibility and multi-dimensional approach. Services are provided at an unusually broad range of partner sites, as well as at home and over the Web. And while the organization teaches hundreds of basic computing class sessions each year, it also teaches specialized courses in digital photography, health care, and civic engagement, while also maintaining a robust online community through its SeniorPlanet website.[6] No public sector funding programs currently exist that support the scope

[4] *See, e.g.*, Jane Fountain, *Building the Virtual State* (Brookings: 2001).

[5] The Advanced Communications Law & Policy Institute at New York Law School has identified this dynamic as a barrier to further broadband adoption among senior citizens. *See Barriers to Broadband Adoption*, at p. 17, A Report to the FCC (Oct. 2009).

[6] SeniorPlanet – www.seniorplanet.org – is a "place where older individuals share ideas and information in a friendly and supportive environment." In general, enhancing senior-oriented online content to be more usable and relevant could spur additional demand. *Ibid.* at p. 12-13.

and range of OATS offerings, and the tendency has been to provide narrowly defined funding opportunities for fragmentary approaches, i.e., only for basic training in libraries or community technology centers.

E. Demonstrating Value

For several years, OATS has offered specialized workshops called "Touch Tanks" wherein various technology devices are set up in a community center or tent (in the case of outdoor events) and seniors can come try them out with the assistance of a volunteer. Seniors can take digital photos, surf the Web, or try out an iPhone. These types of seminars are extremely popular for older adults, who often have many questions about technology that they have been reluctant to ask for fear of ridicule or embarrassment, and provide a critical tool for demonstrating the value of digital technologies for sometimes skeptical seniors. OATS provides these events to encourage older individuals to explore and consider adopting new technologies. However, we have maintained a low frequency of Touch Tank events since they tend to generate dozens of requests for training at each event and OATS training classes are typically over-subscribed, meaning the organization cannot accommodate most requests.

Larger events of this type can engage hundreds of seniors per day, especially when they are combined with senior health fairs, outdoor festivals, or other high-volume programs. The most successful Touch Tank and value demonstration programs take place at sites that also host extensive community- and home-based training, so participants can connect to classes and support on an ongoing basis. Even sites where class enrollment is full can provide some technology support for older adults through proctored open lab hours (OATS uses local seniors to provide volunteer individualized instruction wherever possible). Partnering with a local elected official could lend additional cache to such demonstrations.

In addition to raising awareness of new technologies among older adults, these events provide seniors with a tangible demonstration of why these technologies are important and increasingly essential to everyday life. Offering a clear value proposition to seniors is an important first step towards creating demand for new technologies among older adults.

F. Creating a Technology Adoption Ecosystem

One essential reason for the success of OATS is the organization's intensive focus on its core mission and competency, i.e., the training and social processes required to help older adults use technology to improve their lives. OATS has partnered with hardware refurbishers to deliver over 1,200 free computers to low-income seniors,[7] has partnered with medical institutions to provide home visiting volunteers who deliver OATS training to seniors at home, and has integrated content from nonprofits that specialize in health content into our curriculum and online resources.

[7] A low computer ownership rate among older adults is another barrier to further broadband adoption for this demographic group. Indeed, seniors are less likely than any other age group to own a home computer. *Ibid*. at p. 13.

OATS has at times found it necessary to build computer labs at partner sites to facilitate training programs, and has delivered laptops to nearly 100 seniors at home as part of special programs testing program models. In the long run, it is preferable that OATS contract with outside organizations or companies to provide hardware services so we can concentrate on core competencies, but we have learned some important lessons about how to create efficient mechanisms to deliver hardware and internet service to low-income seniors at home and in labs.

Recently, when OATS was launching a program (the social impact of technology study, still in progress) that required 75 seniors to have broadband and PCs at home, we took the following steps to make sure all participants were online:

- Participants were briefed as a group on the "Give $100/Get $100" program design. Seniors who already had home PCs with internet access were paid $100 to offset their "sunk" costs when they were enrolled in the program. The majority of seniors did not have computers or broadband; these were asked to pay $100 to offset the cost of a new laptop and six months' ISP access, as well as the 20 sessions of training. All enrollees were pleased to participate under these arrangements.
- OATS trainers ensured that all participants had functioning broadband connections.
- OATS purchased new HP laptops from Staples for $400 per unit and installed free AVG software on each, along with custom desktop configurations to optimize usability.
- Trainers then delivered the laptops to all recipients directly and offered free support in helping with set-up and utilization.

This program achieved nearly 100 percent participation from enrollees, and received very high marks on the outside evaluators' survey. A number of participants who received the $100 subsidy returned it voluntarily to OATS (one said she was returning it "to its rightful owner'), and the overall cost to provide people with brand new laptops and internet access was about $600 in hardware and ISP costs, plus another $100-$200 in staff time per client. For an experience typically described by the seniors as life-changing, these costs seem fairly reasonable.

This example is a microcosm of OATS's general experience to date. Oftentimes, the most difficult hurdle that trainers must overcome is an initial fear or skepticism regarding computers and the internet. However, once these feelings are assuaged, and once our trainers provide seniors with a clear value proposition for using these technologies – be it the ability to email friends and family, to blog, to launch a business, or to just surf the Web – seniors are eager learners and avid broadband users. And, more often than not, our students are willing to sacrifice scarce funds to purchase a computer and broadband connection for use at home. Even though our classes and the computer centers where we provide training foster a sense of community and shared experience among older adults, many also appreciate and revel in the individual freedom this technology enables in the home.

G. Key Themes

In light of the above, several themes regarding the design and implementation of effective broadband training programs emerge:

- Training programs are most effective when they are tailored to address the needs of a specific user group. Fully integrated approaches that target a specific user group like OATS are able to overcome the multiplicity of barriers that impede more robust utilization of broadband and related technologies.
- There is a significant amount of latent demand for training services among non-adopters. Overcoming initial hesitance or skepticism regarding broadband or computer technologies is possible by demonstrating usability and presenting a clear value proposition.
- Once new users recognize and accept the value proposition for broadband, and once these users receive adequate training to effectively use their connection, non-adopters, especially older adults, are very avid and capable users.
- Seniors are more likely to view broadband as affordable once they have experienced the tangible benefits of using it, a finding echoed by recent data from Pew. Negative perceptions regarding the usability of a broadband connection or skepticism regarding the value of using, in combination with the cost of a monthly broadband subscription, can render broadband unaffordable or cast it as an unnecessary expense for a senior. However, if a senior or other non-adopter perceives broadband to be an invaluable tool for connecting with family or participating in a welfare-enhancing activity (e.g., working from home), then broadband will likely be perceived as affordable at a wider range of price points.
- Touch tanks, demonstrations, and other such outreach initiatives are effective at piquing interest in learning about new technologies and could, in turn, drive demand for training classes and, eventually, spur adoption of broadband.
- Partnerships and collaborations with a variety of service providers (e.g., broadband ISPs, computer manufacturers or refurbishers, etc.), local institutions (e.g., senior centers or community computing centers), and other stakeholders (e.g., local elected officials) are essential to providing a fully-integrated and comprehensive learning experience. A growing number of stakeholders are experimenting with unique collaborations and approaches to spurring broadband adoption.[8] These efforts should be applauded and encouraged in a variety of contexts (e.g., between service providers and other stakeholders focused on training seniors or people with disabilities).

IV. Conclusion

OATS applauds the FCC for its leadership to date on broadband adoption. The robust record that it is building for its national broadband plan and the many workshops it has held on this issue are very encouraging. All of these actions have created impressive momentum and have brought stakeholders and representatives from a variety of sectors and user group communities together

[8] For example, the cable industry recently proposed a broadband adoption program that would provide subsidized computers and broadband connections to low-income middle-school students. *See* Adoption Plus (A+) Program, National Cable & Telecommunications Association, http://i.ncta.com/ncta_com/PDFs/AdoptionPlus_Overview_12.02.09.pdf.

around the issue of broadband adoption. It is a unifying issue that will hopefully yield targeted policies to spur utilization of broadband among discrete groups and sectors.

OATS is proud to offer its model as a case study for a training program that has succeeded in bringing thousands of older adults to broadband and looks forward to working with the FCC on the critical issue of broadband adoption.

Respectfully submitted,

/s/ Thomas Kamber
Thomas Kamber, Ph.D.
Executive Director & Founder
Older Adults Technology Services, Inc.